

# EXHIBIT G

**Holbrook, Bryan**

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**From:** Nicole Edwards <nicole@edwardsattys.com>  
**Sent:** Wednesday, July 21, 2021 4:03 PM  
**To:** Holbrook, Bryan  
**Cc:** Blake Edwards; Klass, David  
**Subject:** Re: Meet and Confer re: 30(b)(6) Topics

**Importance:** High

Bryan,

We standby all our 30b6 topics and we have gone back and forth with y'all meeting and conferring at least 5 times about this issue. So it is not a violation of the order because the order says "If the dispute is not resolved at mediation Defendant may file a motion to compel by 5:00 p.m. on July 22, 2021, and Plaintiff's response will be due by 5 p.m. on July 26, 2021. If such motion is filed, the discovery deadline will be extended by 14 days for the sole purpose of taking the deposition(s) at issue."

Also the 30b6 deposition will be postponed until we are heard on our motion for leave to compel documents. We are entitled to those documents before we depose the corporate representative.

Sincerely,

Nicole Davis Edwards  
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On Jul 21, 2021, at 2:46 PM, Holbrook, Bryan <[bholbrook@fisherphillips.com](mailto:bholbrook@fisherphillips.com)> wrote:

Blake and Nicole,

Good afternoon. This email is to confirm David's offer, as required under Judge Manasco's Order entered on 7/19/21, to discuss resolution of the outstanding issues related to the Rule 30(b)(6) deposition while counsel were together at mediation. The Order is embedded here:

|            |    |   |
|------------|----|---|
| 07/19/2021 | 49 | TEXT ORDER- This case is before the court on Defendant's motion for leave to file a motion to compel. Doc. <a href="#">48</a> . It appears that the dispute underlying the motion may still be amenable to resolution in whole or in part by agreement of counsel at mediation on July 21, 2021, if it has not already been so resolved. If the dispute is not resolved at mediation, Defendant may file a motion to compel by 5:00 p.m. on July 22, 2021, and Plaintiff's response will be due by 5 p.m. on July 26, 2021. If such motion is filed, the discovery deadline will be extended by 14 days for the sole purpose of taking the deposition(s) at issue. Signed by Judge Anna M Manasco on 7/19/21. (MRR, ) (Entered: 07/19/2021) |
|------------|----|---|

You refused to confer with David and indicated you would get back to us. We believe this is a clear violation of your duty under the Order to meet and confer with us further if the case was not resolved at mediation and will be noting as much in our motion tomorrow. David is now driving back from Alabama, and I will be leaving for the airport shortly to prepare Mr. Fernandez for his deposition, so we need to know your position immediately. If we do not hear from you by 5pm, **Eastern Standard Time**, we will be seeking our associated costs in our motion given your refusal to confer with us as required by the Court's Order.

Thanks,

Bryan



**Bryan Holbrook**

Attorney at Law

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